

Canon

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Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554
U.S.A.

LYK4001

March 31, 1995

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FCC MAIL ROOM

Re: Our comments on your NPRM released on February 7, 1995

- Amendment of Part 2 & 15 of the Commission's Rules to deregulate the Equipment Authorization Requirements for Digital Devices - (ET Docket No. 95-19)

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Dear Sir or Madam,

Hereafter we would like to give you our comments on the subject Notice of Proposed Rule Making released on February 7, 1995.

1. Deregulation of equipment authorization for personal computers and personal computer peripherals

We agree to your basic policy that some kind of deregulation measures are necessary for personal computers and their peripherals. As a means to realize this, we have our viewpoint that it is the best way that all digital devices, including personal computers & their peripherals, be transferred to 'verification'.

Grounds:

According to the present FCC rules, 'certification' is required only for 'class B personal computers' and 'their peripherals', while the other digital devices are subject to 'verification'. (OET Bulletin No. 62, Oct 1992)

However, we are aware that recently quite a few processor devices (such as wordprocessors) have very similar functions as personal computers. In addition, increasing number of digital devices can be connected to personal computers and it is getting harder for us to define 'personal computers' and 'peripherals'.

Nowadays when equipment is widely used as a system, it is not feasible and seems to be 'out of date' to classify digital devices into 'certification' and 'verification' by whether or not they are 'personal computers and their peripherals'.

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2. In case all digital devices will be subject to the new equipment authorization process (Declaration of Conformity-DoC) ,

Despite the above 1. of our comments, if all digital devices are transferred to the new equipment authorization process, we request 'grandfathering' measures for existing models (digital devices that are at present subject to verification).

3. Compliance labelling for personal computers and peripherals

We agree to your proposal that compliance logo or labelling should be applied to personal computers and their peripherals to show their compliance to users. We believe that as the compliance label, the smallest size of labels is preferable, considering that products are getting smaller and they usually don't have enough space to bear the labels. How about introducing the NAFTA common marking (labelling) like 'CE marking' in Europe? As for the design, simple and easily legible one is preferable.

However, we cannot agree to your policy that the new compliance labelling will be applied together with the traditional compliance statement. Under the existing FCC rules, all equipment subject to certification, notification, or verification are labelled with compliance statement. Additionally, as with class A & class B digital devices and peripherals, the information in the user manual also shows compliance with the rules (§ 15.105).

We would like to request that when a new compliance logo or labelling is introduced, the requirement of the traditional compliance statement on products (§ 15.19) be repealed. We believe users will be able to know easily his product compliance with the new labelling and information in the user manual. For some peripherals such as interface boards and pointing devices (mouse) for personal computers, the traditional compliance statement is a little too large in space.

4. Measurement facilities for compliance testing

As part of the new DoC process, you are proposing to require that laboratories testing personal computers and personal computer peripherals be NVLAP accredited. We have objection to this proposal.

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For years, we have our products (digital devices) tested at our measurement facilities. They have been filed with FCC by submitting documentation based on §2.948. We understand that the filing with FCC means the testing facilities are properly controlled and operated. Also, manufacturers are responsible for products of their brand name. Therefore we suppose the present system is enough, and it is burdensome for manufacturers to have the filed measurement facilities accredited by NVLAP with such a huge cost. Such additional cost will raise product prices for users. We believe that only commercial test sites should be accredited by NVLAP.

Cordially yours,



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